

1 George Haines, Esq.  
2 Nevada Bar No.: 9411  
3 Gerardo Avalos, Esq.  
4 Nevada Bar No.: 15171  
5 **FREEDOM LAW FIRM**  
6 8985 S. Eastern Ave., Suite 350  
7 Las Vegas, Nevada 89123  
8 (702) 880-5554  
9 (702) 385-5518 (fax)  
10 Ghaines@freedomlegalteam.com

11 Michael Kind, Esq.  
12 Nevada Bar No.: 13903  
13 **KIND LAW**  
14 8860 South Maryland Parkway, Suite 106  
15 Las Vegas, Nevada 89123  
16 (702) 337-2322  
17 (702) 329-5881 (fax)  
18 mk@kindlaw.com  
19 *Attorneys for Plaintiff Luanne Austin*

20 **UNITED STATES DISTRICT COURT**  
21 **DISTRICT OF NEVADA**

22 Luanne Austin, individually, on behalf  
23 of herself and all others similarly  
24 situated,

25 Plaintiff,

26 v.

27 Allied Collection Services, Inc.,  
Teachers Health Trust dba THT Health,  
and Digestive Disease Center dba  
Digestive Disease Specialists,

Defendants.

Case No.: 2:21-cv-01593-RFB-NJK

**Stipulation for an extension of time  
for Plaintiff to respond to Defendant  
Teachers Health Trust's Motion to  
Strike**

**(First request)**

1  
2 Luanne Austin (“Plaintiff”) and Teachers Health Trust d/b/ a THT  
3 Healt (“Defendant and together with Plaintiff as the “parties”), by and  
4 through their respective counsel, hereby submit this stipulation for an  
5 extension of time for Plaintiff to respond to Defendant’s motion to Strike, filed  
6 on December 13, 2021. This is the first request for an extension of this  
7 deadline.

8 The extension is sought because Plaintiff’s counsel requires additional  
9 time to prepare an appropriate response to the motion due to anticipated staff  
10 shortages during the upcoming holidays.

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1 In good faith and not for the purposes of delay, the parties therefore  
2 stipulate that Plaintiff's opposition to the pending motion shall be due on or  
3 before **January, 17, 2022**.

4  
5 Dated: December 17, 2021.

6 **FREEDOM LAW FIRM**

7 /s/ Gerardo Avalos

8 George Haines, Esq.  
9 Gerardo Avalos, Esq.  
10 8985 S. Eastern Ave., Suite 350  
11 Las Vegas, Nevada 89123  
*Attorneys for Plaintiff Luanne Austin*

12 /s/ John S. Delikanakis

13 John S. Delikanakis, Esq.  
14 Joseph Adams, Esq.  
15 Gil Kahn, Esq.  
16 Christian P. Ogata, Esq.  
17 3883 Howard Hughes Parkway, Suite 1100  
18 Las Vegas, Nevada 89169-5958  
*Counsel for Teachers Health Trust dba THT Trust*

19  
20 IT IS SO ORDERED:

21 

22 \_\_\_\_\_  
23 UNITED STATES DISTRICT JUDGE

24 DATED: December 21, 2021